FILED
BRYAN MUNICIPAL COURT
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IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

SUPPLEMENT TO MOTION TO VACATE:
REQUEST TO SEAL CASE FILE AND REMOVE PUBLIC POSTING

Defendant supplements his Motion to Vacate Judgment (filed November 21, 2025) with this request regarding the public posting of the criminal complaint.

I. THE COMPLAINT REMAINS PUBLICLY ACCESSIBLE

Despite containing graphic allegations of sexual conduct with a minor, the criminal complaint in this case remains:
- Publicly posted on the Bryan Municipal Court website
- Searchable by Defendant's name
- Viewable by anyone with internet access
- Unredacted and unsealed

Standard practice for courts is to seal or redact cases involving:
- Allegations of sexual conduct
- Juvenile victims or alleged victims
- Unproven charges that could destroy a person's reputation

This case involves all three factors, yet the Court has taken no steps to protect either the alleged juvenile victim or the accused.

II. COMMUNITY HARM CAUSED BY PUBLIC POSTING

As a direct result of the public posting of these false allegations, Defendant has suffered:

A. HARASSMENT AND THREATS

Defendant has experienced severe harassment from community members in Williams County who:
- Viewed the graphic criminal complaint posted publicly on court website
- Received or saw fake letters circulating in the community falsely claiming Defendant was guilty and had a warrant
- Heard about the allegations through word-of-mouth in the small rural community

B. BEING LABELED

Despite never being convicted of any sexual offense, Defendant has been:
- Labeled a "child molester" in public
- Referred to by derogatory terms like "chomo"
- Subjected to social ostracism
- Unable to interact normally in the community
- Targeted by vigilante community members

C. ECONOMIC HARM

The public posting has caused:
- Loss of employment opportunities (employers Google his name and see allegations)
- Loss of gig economy work (Door Dash denied access based on pending charge)
- Inability to secure housing (landlords see allegations online)
- Forced sale of home to avoid foreclosure (no longer afford payments due to loss of job)

D. FORCED TO FLEE

The combination of public posting and resulting harassment forced Defendant to flee Williams County and ultimately Ohio entirely. He cannot return to the community where he lived for over 10 years.

III. FAKE LETTERS AMPLIFIED THE HARM

The public posting was amplified by fake letters that circulated throughout Edon, Ohio falsely claiming Defendant is guilty and had a warrant due to missing a court date" These letters do not appear to be official court documents but were made to look official.

The circulation of these fabricated letters, combined with the publicly accessible complaint, created a situation where Defendant was presumed guilty throughout the small community despite:
- Never being convicted
- The allegations being fabricated (as admitted by accuser's mother)
- The complaint being procedurally void
- No trial or evidentiary hearing ever occurring

IV. SELECTIVE SEALING DEMONSTRATES ARBITRARY TREATMENT

The Court has engaged in selective sealing that protects the Court's interests while exposing Defendant's reputation:

SEALED: Probation violation report (prevents Defendant from defending himself)

PUBLIC: Criminal complaint with graphic false allegations (destroys Defendant's reputation)

This arbitrary treatment suggests discriminatory intent or at minimum demonstrates inconsistent application of sealing procedures.

V. ONGOING IRREPARABLE HARM

Even if this Court eventually vacates the conviction (as it must), the harm from the public posting is permanent without sealing:

A. INTERNET SEARCHES

Google searches of "Jeremy Lee Shepherd" return the Bryan Municipal Court website showing the graphic allegations. This will follow Defendant forever unless the case is sealed and removed from public access.

B. BACKGROUND CHECKS

Any background check will show the criminal case, even if ultimately dismissed. The graphic nature of the allegations means:
- Future employers will see it
- Future landlords will see it
- Anyone who Googles his name will see it

C. COMMUNITY STIGMA

Defendant can never return to Williams County. The stigma cannot be erased. Community members will always remember the allegations, true or not.

D. FAMILY RELATIONSHIPS

The loss of the family home has damaged Defendant's relationship with his father that has cancer and biological son and made it impossible to maintain any parental role.

VI. COURT'S DUTY TO SEAL

Courts routinely seal cases involving:
- Juveniles (to protect their identity)
- Sexual allegations (due to their stigmatizing nature)
- Unproven charges (to protect the accused's reputation pending trial)

This case involves all three categories. The Court's failure to seal this case is a departure from standard practice that has caused catastrophic harm to Defendant.

Ohio law recognizes that certain information should be protected from public disclosure. R.C. 2151.358 addresses confidentiality in juvenile cases. Ohio courts have inherent authority to seal cases to protect privacy interests and prevent irreparable harm.

Here, the Court should have sealed this case:
- Upon filing (allegations involve juvenile and sexual conduct)
- Upon discovery of fabricated allegations (no legitimate public interest in false accusations)
- Upon pending Motion to Vacate (charges being challenged as void)

VII. COMPARISON TO OTHER JURISDICTIONS

Other courts in Ohio and nationwide routinely seal cases of this nature. Bryan Municipal Court's failure to do so is an outlier that suggests either:
- Deliberate intent to harm Defendant's reputation, OR
- Gross negligence in following standard procedures

Either way, the harm is severe and continuing.

VIII. REQUEST FOR SEALING IS INDEPENDENT OF MOTION TO VACATE

Even if the Court were to deny the Motion to Vacate (though it must grant it), the Court should still seal this case because:
- Allegations involve juvenile
- Allegations are of sexual nature
- Public posting causes irreparable harm
- Sealing protects both alleged victim and accused
- No legitimate public interest in publicizing unproven allegations

IX. RELIEF REQUESTED

Defendant respectfully requests this Court:

1. SEAL the entire case file in Case No. CRB2400102 immediately;

2. REMOVE the complaint and all case documents from public access on the court website;

3. REDACT Defendant's name from all publicly searchable court records;

4. ORDER that no information from this case be released to the public without court order;

5. Upon granting the Motion to Vacate Judgment (as the Court must), immediately EXPUNGE the record pursuant to R.C. 2953.52;

6. ORDER destruction of all copies of the complaint and related documents;

7. ISSUE order clarifying that Defendant was never convicted of any sexual offense and that the allegations were false;

8. INVESTIGATE the source of the fake letters circulated in the community and take appropriate action.

The public posting of false, graphic allegations of sexual conduct with a minor has destroyed Defendant's life. Only immediate sealing and eventual expungement can begin to remedy the harm.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor
c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd